

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

*Plaintiff,*

v.

SAMSUNG ELECTRONICS CO., LTD. and  
SAMSUNG ELECTRONICS AMERICA,  
INC.,

*Defendants.*

Case No. 2:23-cv-00103-JRG-RSP

**JURY TRIAL DEMANDED**

**JOINT NOTICE REGARDING ADDITIONAL AGREEMENTS**

Plaintiff Headwater Research LLC (“Headwater”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) file this Joint Notice Regarding Additional Agreements:

1. To resolve Samsung’s MIL No. 1, the parties stipulate to the following: A party shall not present evidence, testimony, or argument that another party’s fact witness has not read the patents-in-suit or formed opinions regarding the patents-in-suit unless the witness was designated on such topics or if a given witness gives testimony at trial regarding those topics; and shall not present any argument, evidence, or testimony suggesting that a party’s corporate representative at trial is obligated to prepare on any particular topic or is charged with knowledge of others within the company unless said representative was previously designated as a 30(b)(6) witness on said topic.

2. To resolve Headwater’s MIL No. 1, Samsung stipulates to the following: Samsung stipulates to not present evidence or argument regarding any alleged breach of ethical or fiduciary

duties, allegations of improper shifting of funds, embezzlement, threats, or violations of Bar rules, including in the context of determining an appropriate damages amount. Samsung further stipulates (1) not to introduce testimony, evidence, or argument regarding the amount of offers from Qualcomm or Fortress, and (2) not to offer speculation as to why the InterDigital Letter of Intent was not consummated. To be clear, Samsung understands this stipulation to permit full discussion and use of other evidence relating to the InterDigital Letter of Intent.

3. To resolve the parties' dispute regarding the procedure for playing deposition video clips of witnesses testifying in Korean (*see* Dkt. 280, at 18), the parties stipulate to the following: The parties agree that for any translated depositions, the jury will be shown the question in English, the answer in Korean, and the translation of the answer in English, and the time to play all of those will be attributed to the party who designated, or counter-designated, that particular testimony.

4. Parties have reached agreement on stipulations regarding representative products and will provide the language of those stipulations for inclusion in the juror notebooks for trial, pursuant to the Court's instructions during the December 16, 2024 initial pre-trial conference.

Dated: December 18, 2024

Respectfully submitted,

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**CERTIFICATE OF CONFERENCE**

Counsel for Plaintiff and counsel for Defendants have complied with the meet and confer requirements of Local Rule CV-7(h). The parties agree in the filing of this Joint Notice Regarding Agreements.

*/s/ Marc Fenster*

Marc Fenster

**CERTIFICATE OF SERVICE**

I certify that on December 18, 2024 counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

*/s/ Marc Fenster*

Marc Fenster